From: Allison Castellan - NOAA Federal

To: Wu, Jennifer

CC: Carvalho, Gabriela; Liu, Linda; Henning, Alan; Helder, Dirk; Peterson, Erik; Woodruff, Leigh; Carlin,

Jayne; Waye, Don

Sent: 9/17/2014 8:59:17 AM

Subject: Re: Pesticides Issue Paper - new draft for RW by Friday,

Yes. I'm aware of that but remember, we already approved OR for all of the basic forestry MMs back in 1998. Regardless of whether or not we feel they may have actually met all of the core requirements now, we can't reverse an earlier decision and now say they actually haven't met one of the basic CZARA MMs elements.

On Wed, Sep 17, 2014 at 12:21 AM, Wu, Jennifer < Wu.Jennifer@epa.gov > wrote:

Hi again - please hold off on reviewing the pesticides issue paper until I send an updated version.

Alan found a document that could significantly change and simplify the issues paper. It appears that there may be direct guidelines in CZARA from 1993 that recommend spray buffers for aerial applications. See Page 3-88, Chapter I, on Forest Chemical Management. The management measure for forestry reads that one of the conditions for Forest Chemical Management is to "Establish and identify buffer areas for surface waters. (This is especially important for aerial applications.)" If you're interested in taking a look, here's a link.

http://water.epa.gov/polwaste/nps/czara/upload/czara chapter3 forestry.pdf

From: Wu, Jennifer

Sent: Tuesday, September 16, 2014 11:15 AM

To: Carvalho, Gabriela; Liu, Linda; Henning, Alan; Helder, Dirk; Peterson, Erik; Woodruff, Leigh; allison.castellan@noaa.gov

Cc: Carlin, Jayne; Waye, Don

Subject: Pesticides Issue Paper - new draft for RW by Friday,

Hi Everyone – here's the latest draft of the pesticides issue paper for our meeting on Friday. Thanks to everyone for your additional information.

Jenny Wu

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